

**UNITED STATES DISTRICT COURT
Western District of Texas
Austin Division**

JONATHAN FLORES	§	
<i>Plaintiff</i>	§	CASE NUMBER: 1:21-cv-00386
	§	
vs.	§	
	§	
GENERAL REVENUE CORP.	§	
<i>Defendant.</i>	§	DEMAND FOR JURY TRIAL

ORIGINAL COMPLAINT

1. Plaintiff Jonathan Flores brings this action for claims under the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692, *et seq.*, statutory damages, costs and a reasonable attorney's fee for the Defendant's violations of the FDCPA.

VENUE

2. Venue is proper in the United States District Court for the Western District of Texas, Austin Division, because the acts and transactions occurred in this district and because the Defendants transact business in this district.

THE PARTIES

3. Plaintiff Jonathan Flores ("**Flores**") is an individual who resides in Austin, Travis County, Texas.

4. Defendant General Revenue Corp. (“**GRC**”) may be served by serving its registered agent at the following address:

C T Corporation System
1999 Bryan St., Ste. 900
Dallas, TX 75201

FACTUAL ALLEGATIONS

5. GRC describes itself as “one of the largest and most successful college, university, and guarantee agency-focused collection agencies[.]”¹

6. GRC sent Flores a letter dated April 8, 2021.

7. The April 8, 2021 letter sent by GRC to Flores was an attempt to collect an alleged debt.

8. The alleged debt related to education courses at Miami Dade College.

9. Flores has not attended Miami Dade College since 2011.

10. Flores does not owe Miami Dade College any money.

11. Flores is a "consumer" as that term is defined by § 1692a(3) of the FDCPA.

12. GRC is a “debt collector” as that term is defined by § 1692a(6) of the FDCPA.

¹ See <https://www.generalrevenue.com/ContentSite/About.aspx>

13. The alleged debt is a “debt” as that term is defined by § 1692a(5) of the FDCPA.

COUNT I. VIOLATIONS OF FDCPA § 1692e

14. Plaintiff re-alleges the above paragraphs as if set forth fully in this count.

15. Section 1692e of the FDCPA states:

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:

(2) The false representation of—

(A) the character, amount, or legal status of any debt;...

(10) The use of any false representation or deceptive means to collect or attempt to collect any debt...

16. GRC made a false representation of the amount of a debt.

17. GRC misrepresented the legal enforceability of the underlying debt in its April 8, 2021 letter.

REQUEST FOR RELIEF

18. Plaintiff requests that this Court award him:

- a. Statutory damages;
- b. Costs; and
- c. A reasonable attorney's fee.

JURY DEMAND

Plaintiff demands trial by jury.

Respectfully Submitted,

By: Tyler Hickle
Plaintiff's Attorney

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